REMARKS

Claims 1-43 are currently pending, with claims 1, 10 and 16 being the independent claims. Claims 1, 2, 10 and 16 have been amended. Now new matter has been added. Reconsideration of the application, as amended, is respectfully requested.

In the September 22, 2005 Office Action, independent claims 1, 10 and 16, and dependent claims 2-9, 11-15 and 17-43 were rejected as under 35 U.S.C. §103(a) as unpatentable over GB 2 280 085 ("*McCombe*") in view of U.S. Patent No. 6,301,471 ("*Dahm*"). For the following reasons, it is respectfully submitted that all claims of the present application are patentable over the cited references.

Independent claims 1, 10 and 16 have been amended so as to clarified that the second network is an IP network and that the address of the second network is an IP address. Support for the amendment may be found, for example, at pg. 8, second and third paragraph of the specification. No new matter has been added.

The present claimed invention relates to a system and method for identifying a subscriber of a first network in a second network, where an IP address of the second network is allocated to the subscriber. Mapping information between the IP address of the second network and the identity of the subscriber is generated and supplied to the second network. A client server connection is achieved via the mapping information, which allows the actual subscriber identity of a dynamic address of the second network to be handled over the second network. The second network uses the mapping of the IP address of the second network and the subscriber identity to identify the subscriber (see pg. 4, lines 28 thru pg. 5, lines 3 of the specification).

McCombe relates to subscribers roaming in an AMPS/D-AMPS network in GSM networks. That is, *McCombe* relates to a method for enabling a subscriber to an AMPS network to be identified for roaming in a GSM network (see Abstract).

The Office Action (pg. 4, ¶ 6) states:

> McCombe teaches ... a) allocating an address of said network (9) to said subscriber (McCombe page 3 lines 4-page 4 lines 11; providing *similar identification numbers* for distant subscribers)... (Emphasis added)

McCombe (pg. 3, line 4 to pg. 4, line 11) teaches that some "similar identification numbers" are provided for distant subscribers, i.e., subscribers who are roaming in another network. *McCombe* (pg. 15, 2nd paragraph) describes this in more detail. Namely, *McCombe*

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teaches that a subscriber is associated with a "roaming number" when the subscriber is roaming in a network b. Consequently, *McCombe* teaches an association which can be regarded as a mapping between a roaming number (corresponding to an address in a second network) and the normal telephone number or MSISDN (subscriber identity) of the subscriber.

The Office Action (pg. 4) further states:

> McCombe teaches … b) generating information about mapping
> between the subscriber's address said second network (9) and a
> subscriber identity (McCombe page 11 lines 12-23; *generating*
> *IMSI, and MSISDN)*…. (Emphasis Added)

McCombe (pg. 11, 2nd ¶) describes "mapping" between IMSI and MSISDN. However, Applicant respectfully asserts that there is an inconsistency with respect to the rejection of Applicant's claimed invention. Specifically, with respect to step a) cited at pg. 4 of the Office Action, a reference is made to a mapping between a "similar identification number" and an MSISDN, whereas with respect to step b) a reference is made to "mapping" between IMSI and MSISDN. Thus, *McCombe* may show some kind of mapping between the address of a subscriber in a second network, i.e., the roaming number and a subscriber identity (MSISDN). This, however, does not constitute the mapping defined in amended independent claims 1, 10 and 16. More specifically, *McCombe* fails to teach that an IP address of an IP network is allocated to a subscriber, that information about a mapping between the subscriber's IP address in the IP network (i.e., the second network) and a subscriber identity is generated and that the mapping is transmitted to the IP network. Moreover, *McCombe* is completely silent with respect to the VAS platform recited in independent method claim 1. As a result, it is impossible for *McCombe* to also teach or suggest that the subscriber is identified in a VAS platform based on the mapping information, as further recited in independent claim 1.

The Examiner has cited *Dahm* based on the failure of *McCombe* to teach "identifying a subscriber in the VAS platform based on the mapping info". However, *Dahm* in combination with *McCombe* fails to achieve the invention recited in amended independent claim 1. *Dahm* only describes a way of offering additional services to particular users, which are identified as likely to churn. For example, *Dahm* (col. 8, lines 15-20) teaches when a request is made from a mobile device to a server for some kind of service, either the device ID or the subscriber ID must be included for authentication. *Dahm* (col. 9, line 58 thru col. 10, line 4) teaches that a subscriber request is transmitted with the subscriber ID. Furthermore, *Dahm* (col. 10, line 24) teaches that a value-added service is generated and offered to customers. *Dahm* only teaches the

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identification of customers to which such an offer should be provided. Hence, *Dahm* fails to teach or suggest the generation of <u>information about the mapping</u> between the IP address of the subscriber in the second IP network and a subscriber identity, as recited in amended independent claim 1. Moreover, *Dahm* fails to even hint at a reason for performing the claimed mapping recited in Applicant's amended independent claim 1. Consequently, *Dahm* fails to cure the deficiency of *McCombe*.

As stated previously, it is apparent the Examiner equates the mapping taught in *McCombe* to Applicant's claimed mapping, and interprets "mapping" very broadly. Consequently, in the Examiner's view, the subscriber ID (MSISDN) itself already represents this mapping. In this view, the subscriber is identified in the platform based on the mapping (i.e., the subscriber ID). However, the present claimed invention is directed to solving a completely different problem than the problems solved by *McCombe* or *Dahm*. Specifically, it is difficult for a VAS platform that is connected to a GPRS network to identify a mobile station, because a VAS platform receives only IP packets from a certain source address that is normally only a dynamic IP address of a mobile station. The foregoing description is insufficient for identifying the mobile station (see pg. 2 of the specification). Consequently, it is clear that applicant's claimed mapping does not constitute a mapping between an IMSI and MSISDN or a MSISDN and a roaming number. Rather, the mapping of amended claim 1 is a mapping between <u>an IP address of an IP network</u> and subscriber identity (e.g. the MSISDN). Thus, the combination of *McCombe* and *Dahm* fails to achieve the method of amended independent claim 1, since neither reference teaches nor suggests such a mapping between a subscriber identity and an IP address. *McCombe* or *Dahm*, individually or in combination, would not have provided the motivation for a person skilled in the art at the time of the invention to attempt to achieve the claimed method such that independent claim 1 would have been obvious. Therefore, independent claim 1 is patentable over the combination of *McCombe* and *Dahm*, withdrawal of the rejection under 35 U.S.C. §103 is in order, and a notice to that effect is earnestly solicited.

Independent claims 10 and 16 are apparatus claims associated with the method of independent claim 1. Accordingly, independent claims 10 and 16 are patentable over the combination of the cited references for the reasons discussed above with respect to independent method claim 1.

In view of the patentability of independent claims 1, 10 and 16, for the reasons set forth above, dependent claims 2-9, 11-15 and 17-43 are all patentable over the prior art.

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Based on the foregoing amendments and remarks, this application should be in condition for allowance. Early passage of this case to issue is respectfully requested.

It is believed that no fees or charges are required at this time in connection with the present application. However, if any fees or charges are required at this time, they may be charged to our Patent and Trademark Office Deposit Account No. 03-2412.

Respectfully submitted,

COHEN, PONTANI, LIEBERMAN & PAVANE

By _____

Alphonso A. Collins
Reg. No. 43,559
551 Fifth Avenue, Suite 1210
New York, New York 10176
(212) 687-2770

Dated: December 21, 2005

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